1 2 3	Michele R. Stafford, Esq. (SBN 172509) Edward D. Winchester (SBN 271500) SALTZMAN & JOHNSON LAW CORPORATION 44 Montgomery Street, Suite 2110 San Francisco, California 94104			
4	Telephone: (415) 882-7900 Facsimile: (415) 882-9287			
5	Email: mstafford@sjlawcorp.com Email: ewinchester@sjlawcorp.com			
6	Attorneys for Plaintiffs, District Council 16 Northern			
7	California Health and Welfare Trust Fund, et al.			
8	UNITED STATES DISTRICT COURT			
9	NORTHERN DISTRICT OF CALIFORNIA			
10				
11	DISTRICT COUNCIL 16 NORTHERN	Case No. C16-6730 WHO		
12	CALIFORNIA HEALTH AND WELFARE TRUST FUND, et al.,	PLAINTIFFS' REQUEST TO CONTINUE		
13	Plaintiffs,		ANAGEMENT CONFERENCE; THEREON	
14	V.	Date:	February 28, 2017	
15	PETE CHACON CONSTRUCTION, INC., a	Time: Location:	2:00 p.m. Ctrm. 2 – 17 th Fl.	
16	dissolved California corporation, et al., Defendants.	Tudoo	450 Golden Gate Ave. San Francisco, CA 94102 Hon. William H. Orrick	
17	Defendants.	Judge:	Hon. William H. Ornek	
18				
19	Plaintiffs respectfully request that the Case Management Conference, currently on calendar for			
20	February 28, 2017, be continued for approximately 60-90 days. Good cause exists for the granting of the			
21	continuance, as follows:			
22	1. As the Court's records will reflect, this action was filed on November 21, 2016.			
23	2. Defendants were personally served on January 10, 2017 and January 11, 2017. The Proof			
24	of Service of Summons was filed with the Court on January 23, 2017 (Dkt. #11).			
25	3. Defendants failed to plead or otherwise respond to the lawsuit. Plaintiffs filed a Request			
26	for Entry of Default on February 13, 2017 (Dkt. #13). The Clerk entered the default on February 15,			
27	2017. (Dkt. # 14.)			
28				

PLAINTIFFS' REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE; ORDER THEREON

Case No. C16-6730 WHO

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	4. Attempts to resolve this matter with counsel representing Defendants have so far been			
	unsuccessful, although liability is not believed to be disputed. Accordingly, Plaintiffs respectfully			
	request that the Case Management Conference, currently scheduled for February 28, 2017, be continued			
	for 60-90 days, to allow sufficient time for Plaintiffs to prepare and file a Motion for Default Judgment			
	against Defendants.			
	5. There are no issues that need to be addressed by the parties at the currently scheduled			
	Case Management Conference. In the interest of conserving costs as well as the Court's time and			
	resources, Plaintiffs respectfully request that the Court continue the currently scheduled Case			
	Management Conference.			
	I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above entitled			
	action, and that the foregoing is true of my own knowledge.			
	Executed this 17 th day of February, 2017, at San Francisco, California.			
	SALTZMAN & JOHNSON LAW CORPORATION			
	Den (C)			
	By: /S/ Edward D. Winchester			
	Attorneys for Plaintiffs, District Council 16 Northern California Health and Welfare Trust Fund, et al			
	IT IS SO ORDERED.			
	The currently set Case Management Conference is hereby continued to May 16, 2017 at 2:0			
	p.m., and all previously set deadlines and dates related to this case are continued accordingly. Plaintiff			
	shall file the Motion for Default Judgment within 30 days of the date of this Order.			
	DATED: Eshmony 21, 2017			
	DATED: February 21, 2017			
	THE POLICE AND LEWIS LAND OF PRICE			
	THE MONORABLE WILLIAM H. ORRICK UNITED STATES DISTRICT COURT			